

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAIMARIA BODOR,	:	CIVIL ACTION
Individually and on behalf of all	:	
others similarly situated,	:	
	:	
Plaintiffs	:	
v.	:	NO. 19-cv-5787(JMG)
	:	
MAXIMUS FEDERAL SERVICES, INC.,	:	
	:	
Defendant	:	

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE
AND DISPOSITIVE MOTION DEADLINE**

Pursuant to Your Honor's Policies and Procedures, Defendant and Plaintiff, by and through their undersigned counsel, stipulate and move as follows:

1. Pursuant to the Court's April 10, 2020 Scheduling Order, all Phase I Discovery, Part A is to be completed on or before July 28, 2020. Likewise, all motions for summary judgment on the named Plaintiff's claims shall be filed by July 28, 2020.

2. As a result of the COVID-19 National Emergency and related federal legislation, Defendant Maximus Federal Services, Inc. ("Maximus Federal") experienced a substantial increase in workload beginning in March, 2020. At the same time, Maximus Federal converted almost all staff to a remote work arrangement, a process that entailed reconfiguring infrastructure, equipment, and resources for over 500 staff members across four geographically disparate locations. The significant demands on Maximus Federal's staff continues even today.

3. Because of those developments, Maximus Federal has experienced a delay in complying with Plaintiff's Phase I, Part A discovery requests.

4. The Parties stipulate and agree to extend the deadline for Phase I, Part A Discovery to September 8, 2020.

5. The Parties stipulate and agree to extend the deadline for motions for summary judgment on the named Plaintiff's claims to September 22, 2020.

6. No prior requests for an extension have been sought.

7. This extension does not impact any motion or trial dates in this matter.

Dated: July 22, 2020

/s/ Carl L. Flitter

Carl L. Flitter

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APPROVED BY:

JOHN M. GALLAGHER, U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I caused a true and correct copy of the foregoing document to be served upon all counsel of record via the Court's Electronic Case Filing System.

Dated: July 22, 2020

/s/ Marisa Rachel De Feo
Marisa Rachel De Feo